

FINAL AFFIRMATIVE PROCUREMENT PLAN

for

Redstone Arsenal, Alabama



U.S. ARMY AVIATION AND MISSILE COMMAND
REDSTONE ARSENAL, ALABAMA

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ACRONYMS

AEE	Agency Environmental Executive
AP	Affirmative Procurement
APP	Affirmative Procurement Program
AR	Army Regulation
CFR	Code of Federal Regulations
CPG	Comprehensive Procurement Guideline
DEPW	Directorate of Environment and Public Works
DFARS	Defense Federal Acquisition Regulation Supplement
DLA	Defense Logistics Agency
DoD	Department of Defense
EO	Executive Order
EPA	Environmental Protection Agency
FAR	Federal Acquisition Regulation
FEE	Federal Environmental Executive
GPO	Government Printing Office
GSA	General Services Administration
IMPAC	International Merchant Purchase Authorization Card
INEEL	Idaho National Engineering and Environmental Laboratory
JWOD	Javits-Wagner- O'Day
OFPP	Office of Federal Procurement Policy
RCRA	Resource Conservation and Recovery Act
RMAN	Recovered Materials Advisory Notice
RMAPTS	Recycled Materials Affirmative Procurement Tracking System
RSA	Redstone Arsenal
USACE	United States Army Corps of Engineers
U.S.C.	United States Code
www	World Wide Web

1.0 AFFIRMATIVE PROCUREMENT PROGRAM OVERVIEW

This document formally establishes Redstone Arsenal's (RSA's) Affirmative Procurement Program (APP) for products containing recovered materials and provides Installation-wide guidance for implementing an effective program. The purpose of RSA's APP is to foster markets for recovered materials by maximizing the federal government's purchases of products containing recycled material. A secondary objective is to reduce the amount of solid waste requiring disposal by purchasing and using products containing recovered materials.

Consistent with responsible environmental stewardship as defined in Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, and the requirements of Federal Acquisition Regulation (FAR) Part 23 and Executive Order (EO) 13101, *Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition*, this Affirmative Procurement (AP) Plan establishes standard procedures for procuring environmentally preferable goods and services to the maximum extent practicable. To achieve this goal, RSA will accomplish the following:

- Establish an APP;
- Purchase environmentally preferable products and services to the maximum extent practicable, consistent with EO 13101, the Environmental Protection Agency's (EPA) Comprehensive Procurement Guideline (CPG); EPA's Recovered Materials Advisory Notices (RMAN); and the Office of Federal Procurement Policy (OFPP) Letter 92-4, *Procurement of Environmentally Sound and Energy-Efficient Products and Services*;
- Publicize and promote RSA's use of environmentally preferable goods and services through convenient and cost-effective methods such as the World Wide Web (www) and other types of electronic distribution;
- Submit Annual AP Progress Reports to the Federal Environmental Executive, pursuant to Section 601(e) of EO 13101, and the OFPP.

1.1 REGULATORY REQUIREMENTS

Several legislative, Department of Defense (DoD), and Army regulations and policies exist that require the implementation of an APP. The following sections briefly describe the policies set forth by each of these drivers.

1.1.1 The Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) was enacted in 1976 to address the issue of how to safely manage and dispose of the huge volumes of municipal and industrial waste generated nationwide. As the title suggests, RCRA serves to promote waste management through resource conservation and recovery. RCRA established specific provisions to promote the development of recycling capabilities and technologies, and to

develop a market for recyclable materials. As a result, the statute contains provisions for federal procurement requirements in an attempt to increase the demand for products containing recycled materials.

RCRA Section 1004(17), 42 United States Code (U.S.C) 6903(17), defines a “procuring agency” as “...any federal agency, or any state agency or agency of a political subdivision of a state using appropriated federal funds for such procurement, or any person contracting with any such agency with respect to work performed under such contract.” Assumptions under RCRA include:

- Federal agencies are always procuring agencies.
- A state or local agency is a procuring agency when it uses appropriated federal funds for procurement.
- A contractor is a procuring agency when it is contracting with a federal, state, or local agency using appropriated federal funds for procurement.
- Only government agencies and their contractor’s are/or can become “procuring agencies.”

Private party recipients of federal loans, grants, or funds under cooperative agreements are not procuring agencies.

RCRA Section 6002(a) (42 USC 6962) requires “...a procuring agency shall comply with the requirements set forth in this Section and any regulations issued under this Section, with respect to any purchase or acquisition of a procurement item where the purchase price of the item exceeds \$10,000 or where the quantity of such items or of functionally equivalent items purchased or acquired in the course of the preceding fiscal year was \$10,000 or more.” Under RCRA, federal agencies purchasing designated items must purchase the item with the highest percentage of recovered materials practicable, consistent with price, performance, competition, and availability. The purchasing requirements apply to any federal agency that purchases more than \$10,000 of any one of the CPG items. This threshold is applied at the DoD level and not at the installation level. Since the DoD as a whole purchases more than \$10,000 of all CPG items, each installation must comply with the requirements no matter how much of an item they purchase.

To comply with RCRA, federal government agencies must give preference in their purchasing programs to products and practices that conserve and protect natural resources and the environment. A fully established APP will meet this requirement as long as the program contains the following four elements:

1. A preference program that demonstrates that the agency has a preference for products that contain recycled materials and that these materials meet the standard for recycled-content established by EPA. These products will include EPA’s list of CPG items.
2. A promotion program that encourages employees, contractors, vendors, and others associated with a federal agency to adhere to the requirements of the established APP. Each party should consider the use of products that contain the minimum standard recycled content as defined in the preference program.

3. A certification program that requires vendors to certify that the products that they are providing to the federal agency do indeed contain the minimum content recycled products.
4. A monitoring program to review the effectiveness of the APP.

1.1.2 Executive Order 13101

EO 13101, *Greening the Government through Waste Prevention, Recycling, and Federal Acquisition*, 14 September 1998 (63 FR 49643) revoked and superseded EO 12873, *Federal Acquisition, Recycling, and Waste Prevention*, October 1993. EO 13101 reiterates, supports, and expands upon the original requirements of EO 12873. EO 13101 strengthens federal efforts to protect the environment and promote economic growth through the purchase of recycled and other environmentally preferable products. It directs agencies to establish recycling targets, encourages them to purchase environmentally preferable products, and creates a White House task force to oversee federal recycling efforts.

EO 13101 requires the head of each executive agency to incorporate waste prevention and recycling in daily operations, and work to increase and expand markets for recovered materials through greater federal government preference and demand for such products. It is the national policy to prefer pollution prevention options and strategies whenever feasible. EO 13101 requires federal agencies to acquire and use environmentally preferable products, services, and implement cost-effective procurement preference programs favoring the purchase of these products and services. Furthermore, Section 402 (b) of EO 13101 requires that 100 percent of an agency's purchases of EPA-designated items meet or exceed EPA guideline standards unless written justification is provided that a product is: (1) not available competitively; (2) not available within a reasonable timeframe; (3) does not meet appropriate performance standards; or (4) is only available at an unreasonable price.

In addition, the EO required the creation of the Steering Committee on Greening the Government Through Waste Prevention and Recycling to develop policy regarding the implementation of the EO. The actual implementation of EO 13101 within each federal agency is delegated to a Task Force that is chaired by an appointed Federal Environmental Executive (FEE) within the EPA, and staffed by Agency Environmental Executives (AEE) who are appointed from within each of the federal executive agencies.

1.1.3 Federal Acquisition Regulations

Title 48 Code of Federal Regulations (CFR) Part 23 (FAR 23), *Environment, Conservation, Occupational Safety, and Drug-Free Workplace*, sets forth acquisition policies and procedures supporting the federal government's program for protecting and improving the quality of the environment through the use of recovered materials. FAR Part 23 references related provisions and clauses (FAR 52) which detail contractor compliance requirements relative to recovered material content in designated items to be used in the performance of the contract.

FAR Part 23.4, *Use of Recovered Materials*, states it is the Government's policy to acquire, in a cost-effective manner, items composed of the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition without adversely affecting performance requirements or exposing suppliers' employees to undue hazards from the recovered materials. Certifications required in the FAR include:

- FAR 52.223-4, *Recovered Material Certification*, prescribes the insertion of this provision into solicitations that specify the use and/or procurement of recovered materials; and
- Section 23.406(b) of the FAR requires the inclusion of clause 52.223-9, *Estimate of Percentage of Recovered Material Content for EPA Designated Items used in the Performance of the Contract*, into contracts exceeding \$100,000 that specify the use of an EPA designated item.
- The Defense Federal Acquisition Regulation Supplement (DFARS) Part 223.4, *Use of Recovered Materials*, also implements EO 13101. Included in the DFARS is the requirement that Departments must centrally collect information submitted in accordance with the clause at FAR 52.223-9.

1.1.4 DoD Regulations and Policy

DoD Instruction 4715.4, *Pollution Prevention*, calls for an APP to be established in accordance with Section 6002 of RCRA and EO 12873 (superseded by EO 13101). In addition to this instruction, the DoD policy on procurement of EPA designated items, dated July 1995, states that 100 percent of such purchases will meet or exceed the guideline standards unless written justification meeting one of the four exemption criteria is made part of the procurement file.

1.1.5 Army Regulations and Policy

AR 200-1 identifies the Army's commitment to environmental stewardship through pollution prevention, conservation and preservation of natural and cultural resources, compliance with all applicable environmental laws, and restoration of contaminated sites. Under its pollution prevention requirements, any Army operation or activity must promote the acquisition and use of environmentally preferable products and services, and must implement preference programs favoring the procurement of items containing recovered materials.

In the U.S. Army Corps of Engineers (USACE) Commander's Policy Memorandum #3 dated January 15, 1997, USACE commanders are directed to promote good environmental stewardship through the promotion of efficient material and energy use practices, including affirmative procurement of recycled products. This policy applies to all Major Subordinate Command commanders, district commanders, and commanders/directors outside the district structure.

1.1.6 Comprehensive Procurement Guideline and EPA Requirements

Congress, under Section 6002 of RCRA and EO 13101, authorizes the CPG program. EPA is required to designate products that are or can be made with recovered materials, and to recommend practices for buying these products. Once a product is designated, procuring agencies are required to purchase it with the highest recovered material content level practicable.

In 1995, EPA issued the first CPG that covered EPA's original five procurement guidelines and added 19 products. The first CPG update (CPG II), published in November of 1997, designated an additional 12 items. A second CPG update (CPG III), published in January 2000, designated an additional 18 items. This update brought the total number of CPG items to 54. These designated CPG items are presented in Appendix A.

EPA also issues guidance on buying recycled-content products in RMANs. The RMANs recommend recycled-content ranges for CPG products based on current information on commercially available recycled-content products. RMAN levels are updated as marketplace conditions change.

EPA has also issued one “general” procurement guideline (40 CFR 247). 40 CFR 247 does not contain any regulatory requirements, but recommends various APP implementation strategies. RSA’s APP shall be expanded to include new guideline items and requirements as they are issued.

1.2 APPLICABILITY

Under the CPG, EPA has determined:

- Federal agency adherence to the practices recommended in the CPG constitutes compliance with Section 6002 of RCRA.
- The CPG applies to all federal, state, or local agencies using appropriated federal funds, and to persons contracting with any such agencies with respect to work performed on behalf of the agencies. Federal agencies are responsible for ensuring appropriate language is contained in contracts requiring contractors to comply with such regulations.
- Procuring activities should establish minimum recovered material content standards for each of the 54 items to ensure the recovered material content required in applicable contract specifications is the maximum available without jeopardizing the intended use of the procured item. Procuring activities must set minimum content standards at the highest levels practicable to meet the statutory requirements.
- Each procuring agency is required to ensure its procurement specifications for designated items do not unfairly discriminate against the use of post

consumer/recovered materials. Any procurement specifications prohibiting the purchase of recovered materials should be revised as required by the Directorate of Environmental Management. In cases where virgin materials are needed, the contract specifications should provide justification as to why virgin materials are required.

- Any determination, for technical or other reasons, that a product containing recovered material cannot meet reasonable performance standards shall be documented.

This APP guidance applies to all RSA personnel, including on-site contractors. It is the responsibility of RSA to ensure: 1) appropriate existing contracts are revised as requested by the Directorate of Environmental Management to include APP compliance provisions; and 2) appropriate new contracts contain APP compliance provisions. Related procurement policy should be provided to RSA's contractors in their contracts, which would include, but is not limited to, FAR 52.223-4, *Recovered Material Certification*, "Use of Recycled Materials" provision in Scopes of Work, and a copy of the "Recovered Materials Determination Form." RSA's contractors who procure a majority of the products regulated by EPA's guidelines should be familiar with all applicable APP requirements contained in their contracts with RSA. Once appropriate provisions are included in each contract, the contractor would be required to comply with RSA's APP as if the contractor were a DoD entity. Hence, the contractor would be required to monitor and report on its APP-related procurement activities as well as require its applicable subcontractors to comply with RSA's APP.

International Merchant Purchase Authorization Card (IMPAC) holders are required to comply with AP requirements set forth in EO 13101 and RCRA. It is the responsibility of the procuring parties to follow the CPGs, associated RMANs, and overall intent of the EO. All purchases made with appropriated federal funds, including credit card purchases, must meet the requirements to purchase EPA-designated products made with recovered materials unless one of the four exceptions applies. (USACHPPM, 2000)

Requiring elements and/or planners developing Contract Requirements Packages (CRPs) will specify the use of recovered materials in accordance with EPA's content standards and avoid the use of virgin materials. For procurements with potential for use of recovered material, whether or not included on the preference lists, the requiring element and/or planners will submit a brief description of the products or recovered materials to be used to the contracting office with the CRP. Requiring elements should specify recycled-content products in specifications, remove all references to virgin materials in contract specifications, check all product descriptions for recycled-content information, and request the incorporation of appropriate FAR clauses into contracts.

1.3 SUPPLY SOURCES

RSA procurement activities should consider established federal supply sources, such as the General Services Administration (GSA), Government Printing Office (GPO), and Defense Logistics Agency (DLA), as a competitive source for EPA-designated items and other recycled products. Procuring recycled products through these sources offers the following

advantages:

- Products have been competitively bid;
- Products meet or exceed EPA minimum content standards for recovered materials; and
- Paper and paper products purchased through GSA and GPO do not have to be tracked or reported by agencies. (GSA and GPO provide an agency's total for AP reporting purposes when purchased through them.)
- Re-refined oil and pallets purchased through DLA do not have to be tracked or reported by federal agencies. (DLA provides an agency's total for AP reporting purposes when purchased through DLA.)

These sources also provide an additional service through independent estimation, certification, and verification of EPA-designated items containing recovered materials, thereby reducing overhead costs for procurement originators to track and monitor vendor compliance with AP requirements.

An AP Guideline for Purchasing Items Containing Recycled Content will be distributed to all personnel responsible for procuring CPG items. This guide will include a list of local and regional businesses that offer CPG items. A Manufacturers List of recovered content construction products as well as the GSA Environmental Products Guide will also be included in the reference package.

2.0 ESTABLISHING THE AFFIRMATIVE PROCUREMENT PROGRAM

The Installation Commander has overall responsibility for implementing an APP compliant with public law, EOs, DoD, and Army policies and regulations, as well as applicable state or local requirements. However, execution of the APP is the responsibility of many organizations. This section summarizes the responsibilities of the key organizations in the RSA APP, including the AP Team and the consumers.

Establishing an effective APP at an Army installation requires the development of an infrastructure of people and procedures to integrate the APP into the day-to-day operations of the facility.

With the development of an AP Team, many issues would be addressed to ensure the success of the RSA APP, including:

- Determining the applicable use of recycled-content products across all RSA activities;
- Coordinating AP efforts with tenant activities;
- Complying with purchasing requirements;
- Developing an Installation-wide education program to support recycling and AP efforts;
- Managing public awareness campaigns for the RSA recycling and reuse programs;
- Supporting the Installation's landscaping program by turning green waste into mulch and compost;
- Coordinating recycling efforts with federal, state, and local regulatory agencies;
- Establishing an Installation-wide AP tracking program;
- Establishing metrics for the effectiveness of the program; and
- Providing input and suggestions on recycling and AP that the Army or RSA desires to initiate.

The AP Officer from the Engineering, Environment, and Logistics Oversight (EELO) Office, assisted by the AP Team, would identify specific opportunities for purchasing compliant products for all EPA designated items. The EELO and the RSA Compliance Advisor lead the AP Team effort to educate Installation personnel and provide program publicity, and will be responsible for AP data collection and reporting.

The leader of the AP Team would ideally be a representative of the Directorate of Environmental Management (DEM). This would allow the APP to fit seamlessly within the overall solid waste/recycling program at RSA. The metrics generated from this program would be reported along with the metrics of the other solid waste program areas.

It is recommended that representatives from each of the following areas comprise the AP Team:

- Acquisitions/Contracting
- Installation Supply Store

- Installation Operations
- Construction
- Vehicle Maintenance
- Public Affairs
- Government Purchase Card Monitor
- Tenant Organizations (with impact on AP purchases)

2.1 ROLES AND RESPONSIBILITIES OF THE AP TEAM MEMBERS

Each member of the AP Team would be responsible for implementing specific areas of the APP. Below is a list of suggested responsibilities for each AP Team member.

2.1.1 AMCOM AP Officer (EELO)

The AP Officer would be responsible for the overall implementation of AP at AMCOM facilities.

The AMCOM AP Officer would accomplish the following in support of the APP at RSA:

1. Issue policy and compliance guidance as a reminder for AP compliance.
2. Review contracts to ensure that AP is included in the terms and conditions of any purchase agreements.
3. Strive to ensure that RSA is meeting the Army goals and objectives of 100 percent compliance with AP purchases in all the guideline categories through the effective implementation of an APP at RSA.
4. Collect AP metric information from various sources and forward the annual report to the AP Team Leader for inclusion in the Solid Waste Annual Reporting.

Because the AMCOM EELO Office is the lead agency responsible for implementing AP at AMCOM facilities, EELO will be the records curator for this program. All AP metrics from FAR 52.223-9 on applicable contracts and the Recovered Materials Determination Form will be collected and compiled by EELO on an annual basis. The AP contract information should be forwarded within 4 weeks of the Fiscal Year end to the Affirmative Procurement Officer:

Commander
U.S. Army Aviation and Missile Command
ATTN: AMSAM-EN (Oligner)
Redstone Arsenal, AL 35898

2.1.2 RSA AP Team Leader/Compliance Advisor (DEM)

The AP Team leader would:

1. Be the main point-of-contact for all AP initiatives involving Redstone Arsenal Support Activity (RASA).
2. Form and maintain an AP Team consistent with this guidance document.

3. Strive to ensure that RASA is meeting the Army goals and objectives of 100 percent compliance with AP purchases in all the guideline categories through the effective implementation of an APP at RSA.
4. Periodically review the effectiveness of the APP and recommend adjustments to appropriate AP Team members when necessary.
5. Collect information on AP and develop an AP library to be used by members of the AP Team or other interested RSA personnel. New information collected will be disseminated to interested parties on a regular basis.
6. Coordinate a training program for RSA personnel on AP.

2.1.3 Installation Supply Store

The Installation Supply Store would support the RSA APP by:

1. Directing users to buy recycled products whenever possible.
2. Providing reports to the designated personnel on quarterly AP purchases.

2.1.4 Acquisitions/Contracting

The AMCOM Acquisition Center will ensure that the required FAR 52.223-4, "Recovered Material Certification," is placed into solicitations that specify the use of recovered materials, and FAR 52.223-9, "Estimate of Percentage of Recovered Material Content for EPA Designated Products," is placed in solicitations and contracts exceeding \$100,000 pursuant to applicable FAR and DFAR regulations.

2.1.5 Installation Operations

Installation Operations purchases a number of products that can fall within the AP guidelines. Their responsibilities in implementing the APP would include:

1. Purchase requests for products that meet the guideline criteria in the categories of: Transportation, Construction, Landscaping, and Parks and Playgrounds.
2. Potentially recycle organic matter generated on the Installation including grass clippings, leaves, tree limbs, and chippings for mulch and soil amendments.
3. Reports on purchasing metrics to the designated personnel on a quarterly basis.

2.1.6 Construction

As the on-site point-of-contact for all Installation construction, this office would be responsible for ensuring that all new construction and renovations meet AP guidelines. Specific duties would include:

1. Establish standard specifications in construction documents to require that construction materials meet established AP requirements. Provide to the AP

Officer a written determination if a non-compliant guideline item is called out in the specifications, and sends a copy to the RSA AP Team Leader for central filing.

2. Verify that construction contractors are adhering to AP guidelines by reviewing product samples that are in the construction category prior to their installation.
3. Ensure the installation of AP construction category material through the use of their respective inspection program.
4. Report metrics on the use of AP construction material on a quarterly basis to the designated personnel.

2.1.7 Vehicle Maintenance

Vehicle maintenance has the important role of ensuring 100 percent compliance in the Vehicular Products category. Specific responsibilities would include:

1. Purchasing products in the Vehicular Products category that meet AP guidelines. This includes the purchase of re-refined oils, retread tires, and reclaimed coolant.
2. Reclaiming engine coolant from Installation vehicles requiring coolant change-out instead of buying virgin or reclaimed coolant.
3. Providing metrics to the designated personnel about AP purchases on a quarterly basis.

2.1.8 Public Affairs

Public Affairs would assist the AP Team in the following manner:

1. Establish a public outreach/awareness program by disseminating information to Installation personnel through ads/articles in the Installation newspaper (Redstone Rocket), flyers, banners, web sites, brochures, or any other media deemed appropriate.
2. Have the Installation newspaper or other print media produced using newspaper stock conforming to AP guidelines.

2.1.9 Government Purchase Card Monitor

Government purchase cardholders are a major source of RSA purchasing capacity. So that RSA can meet its AP goals, Government purchase cardholders must:

1. Understand the requirements of AP and be knowledgeable of the AP purchasing categories. For products that they purchase in one or more of those categories, they must consider purchasing products that meet or exceed the requirements of the AP guidelines.
2. Seek out information from the AP Officer or the AP Team Leader on vendors in the area who provide products that meet or exceed AP requirements.

3. Report AP purchase information accurately in a manner prescribed by the AP Officer.
4. If an item identified for AP cannot be purchased with recovered materials, the cardholder must have a written, approved determination in his/her file for all requirements for micropurchases in excess of \$2,500 (\$2,000 for construction contracts). This determination is not required for items requisitioned from established Federal supply sources (GSA, DLA, GPO, etc.), purchases less than \$2,500, or construction purchases less than \$2,000.

Additionally, the Government purchase card monitor would:

1. Ensure that Government purchase cardholders are trained to purchase products that meet AP requirements.
2. Review Government IMPAC card purchases to ensure that individual cardholders are implementing AP.
3. Provide GSA office product catalogs, which include recycled content products, to cardholders.

2.2 PUBLIC TRAINING AND OUTREACH

One of the requirements stipulated in Section 6002 of RCRA regulation is that a facility's APP must include a promotional program. The promotional program educates Installation personnel and advances the APP throughout the facility. Installation personnel must be aware of the APP before they can be expected to respond to its requirements. This outreach program can be effectively implemented through information dissemination (including the AP Reference Guide), training, and incentives.

The RSA preference and promotional program will be targeted at general groups of purchasers. These groups will include general administration, construction contractors, motor pool, maintenance, acquisitions, and Installation operations contractors. An AP Reference Guide will be developed that will include step-by-step guidelines that list the CPG items and their associated RMANs. Federal, regional, and local vendors that sell CPG products will be identified in the AP Reference Guide, and a GSA Environmental Products Guide along with a Manufacturers List for construction products made with recovered materials will be included in each package. An informational brochure found in the AP Reference Guide will serve to educate RSA personnel, contractors, and potential bidders on RSA's requirements for AP. The AP Reference Guide will be distributed to all affected personnel.

2.2.1 Training

In addition to the distribution of the AP Reference Guide, training of RSA personnel should be conducted for those individuals who actively purchase or specify materials for a number of organizations throughout the Installation. These purchasing individuals may include:

- Base Supply
- Environmental, Construction, and Installation Operations

- Contracting/Acquisitions
- Government purchase card holders
- Vehicle Maintenance

Suggested training topics may include:

- What is AP?
- Why buy recycled products?
- Legislation standards and their effective dates for implementation
- RCRA AP requirements
- Army requirements
- Exceptions to purchasing AP products
- EPA CPG and RMANs
- Example guideline items
- Example purchasing procedures
- Requirements for Government purchase card holders
- Installation AP Team members
- Requirements for RSA Personnel

Although all of this information will be provided in the AP Reference Guide, further training, i.e., an annual on-site workshop, may be required to adequately educate RSA personnel on AP.

2.2.2 Public Outreach

In addition to training, the AP Team must publicize the importance of AP purchases to the general RSA population. The purchasing procedures of the facility must be changed and the purchasing of products that contain recycled materials must become institutional at the facility. Every purchaser or even user of recycled products must be informed of the importance of AP. If the reasons for purchasing materials containing recycled products are explained to all Installation personnel, this concept will be more acceptable.

Public outreach can take various forms and should involve the AP Officer, AP Team Leader and Public Affairs. Specific actions would include all or any combination of the following:

- Distribution of AP Reference Guide
- Preparing and displaying posters
- Placing notices or ads in the Installation newspaper or web site
- Publishing a series of articles on AP in the Installation newspaper
- Hosting an AP “open house” where local vendors can show their products that meet the EPA guidelines
- Providing awards or other special recognition for organizations that make great contributions to furthering AP on RSA
- Inviting JWOD representative to speak

2.3 MONITORING PROGRAM

One of the RCRA requirements for establishing an APP is to establish an annual monitoring and review process. Similar to other pollution prevention program component areas, RSA will be required to show progress in meeting the Army goal of 100 percent compliance in each of the EPA guideline areas. RSA will develop a formal procedure for collecting this information from the individual purchasers at the Installation.

The proposed tracking system would provide each purchaser at RSA a CPG certification and reporting form, "Recovered Materials Determination Form," that personnel can fill out and return as completed. Users are encouraged to transmit this information electronically every quarter using the electronic Recovered Materials Determination Form. The RSA Compliance Advisor (troy.pitts@redstone.army.mil) can provide this form. All purchases made by civilians, military, or on-site contractors greater than \$2,500 will require the completion of the "Recovered Materials Determination Form." The completed form should be mailed to the Affirmative Procurement Officer:

Commander
U.S. Army Aviation and Missile Command
ATTN: AMSAM- EN (Oligner)
Redstone Arsenal, AL 35898

The AMCOM EELO Office would collect and compile information received from contracts requiring the estimation and certification of EPA designated items as stated in FAR 52.223-9. Furthermore, all contracts not originating in the AMCOM Acquisition Center (i.e, U.S. Army Corps of Engineers) should send all applicable AP metrics to EELO for inclusion in the AP report. The compiled, annual AP metric information should be submitted within four weeks of the end of the fiscal year to the Affirmative Procurement Officer:

Commander
U.S. Army Aviation and Missile Command
ATTN: AMSAM- EN (Oligner)
Redstone Arsenal, AL 35898

The tracking system would aid AP personnel in tracking and reporting specific data concerning the procurement of products that contain recycled material and the quantity of recycled material contained in each product. The proposed tracking system would allow users to quickly do a "self-assessment" of their year-to-date status of recycled material purchases and recycled material contents of products at any time.

3.0 PROPOSED AFFIRMATIVE PROCUREMENT OPPORTUNITIES

There are a number of opportunities that are available to Army installations for implementing an effective APP. The following tables provide a summary of opportunities by CPG category. In addition, another category called “Administrative Opportunities” lists opportunities that are not associated with a CPG category, but are considered procedural measures that will help RSA implement the APP.

TABLE 3-1. PROPOSED AFFIRMATIVE PROCUREMENT OPPORTUNITIES: PAPER AND PAPER PRODUCTS

OPPORTUNITY	ACTION
<i>Use recycled-content copier paper</i>	<i>All functional areas should buy only recycled-content copy paper. Review current stock number and procedures for acquiring copy paper. Copy paper should be at least 30% post-consumer or recovered content.</i>
<i>Change copier leases</i>	<i>If a copier lease currently has specified in it that the vendor supply the machine's paper, ask the vendor to supply you with paper that conforms to the EPA RMAN. There should not be any change in price, because recycled-content paper is about the same price as virgin. For new copier leases, ensure that the terms of the lease, if they include supplying the paper, includes that the paper be recycled-content paper meeting the EPA RMAN guidelines.</i>
<i>Require bathroom towels, toilet paper, and tissues that meet the RMAN</i>	<i>Ensure that you are purchasing products that meet the EPA RMAN for these categories. Refer to the GSA Federal Supply Service Environmental Products Guide for details on ordering these items. If the janitorial service contract that you have requires the service to provide the paper products, request that these be changed to recycled-content paper products or make the change the next time the contract comes up for renewal.</i>
<i>Buy other paper-based office supplies that meet the RMAN</i>	<i>Ensure that other paper-based office supplies (e.g., paper pads, envelopes, manila folders, hanging folders, index cards, etc.) that are bought meet the EPA RMAN requirements. Refer to the GSA Federal Supply Service Environmental Products Guide for details on ordering these items.</i>
<i>Purchases using Government purchase card must conform with the JWOD Act</i>	<p><i>If office supplies are purchased by individual organizations, these organizations must comply with the requirements of the JWOD Act. This requires that each organization must order office supplies either from GSA Customer Supply Centers, through GSA Advantage! or through JWOD-compliant commercial vendors. Orders to commercial JWOD vendors can be made by telephone, fax, or by electronic data exchange.</i></p> <p>NOTE: ORGANIZATIONS SHOULD NOT PURCHASE NIB/NISH-PRODUCED OFFICE SUPPLIES DIRECTLY FROM LOCAL COMMERCIAL VENDOR STORES SUCH AS STAPLES, OFFICE DEPOT OR OFFICEMAX.</p>
<i>Produce Installation newspaper on recycled-content stock</i>	<i>Whenever possible, produce the Installation newspaper or other public communication on newsprint meeting the RMAN. Check with your printing vendor on availability/cost impacts.</i>

TABLE 3-2. PROPOSED AFFIRMATIVE PROCUREMENT OPPORTUNITIES: VEHICULAR PRODUCTS

<i>OPPORTUNITY</i>	<i>ACTION</i>
<i>Purchase re-refined oil</i>	<i>Re-refined oil is available from the Defense Supply Center Richmond in SAE 5W-30, 10W-30 15W-40, 30 and 40 weights. SAE 5W-30 and 10W-30 engine oils are available in accordance with CID A-A-52039. SAE 30, 40 and 15W-40 engine oils are available in accordance with A-A-52306, and SAE 15W-40 engine oils are available in accordance with MIL-PRF-2104. It is available in quart bottles, five-gallon cans, and 55-gallon drums. Re-refined motor oil is accepted by most major manufacturers of cars and trucks, and has been approved for use by the Army.</i>
<i>Purchase retread tires for all vehicles</i>	<i>Use retread tires on light trucks, medium trucks, and buses. The retread tires meet commercial and government and safety standards.</i>
<i>Reclaim engine coolants/ purchase engine coolants</i>	<i>Reclaim and reuse engine coolants to the extent possible. If you need to purchase new engine coolant, consider purchasing reclaimed engine coolant.</i>

TABLE 3-3. PROPOSED AFFIRMATIVE PROCUREMENT OPPORTUNITIES: CONSTRUCTION PRODUCTS

<i>OPPORTUNITY</i>	<i>DESCRIPTION</i>
<i>Revise construction specifications</i>	<i>Construction specifications for both new construction and renovations must be revised to require that contractors use or supply building materials that meet or exceed the current EPA RMAN requirements.</i>
<i>Verify construction contains recycled-content products</i>	<i>After contract award, request the contractor submit a sample of the recycled-content products to be utilized on the requirement to the Contracting Officer for review/approval (Samples of floor tile, restroom and shower dividers, patio blocks, carpeting, and other applicable recycled-content products.) Have the contractor demonstrate that these items meet the EPA RMAN requirements and comply with your specification. Question the contractor about how they will ensure that the concrete they use on the project will meet the EPA RMAN (and your) specifications.</i>
<i>Use construction materials that meet the EPA RMAN</i>	<i>Materials bought by supply or special ordered for Installation maintenance projects should conform to the EPA RMAN. These products include: building insulation products, carpeting and carpet cushion, cement and concrete containing coal fly ash, floor tiles, flowable fill, patio blocks, railroad grade crossing surfaces, shower and restroom dividers, structural fiberboard, and laminated paperboard. Review current stock items and confer with Contracting, Installation Supply, or local vendors to ensure that new stocks meet the requirements of the EPA RMAN.</i>
<i>Use consolidated and reprocessed latex paint</i>	<i>Use consolidated or reprocessed latex paint whenever possible.</i>

TABLE 3-4. PROPOSED AFFIRMATIVE PROCUREMENT OPPORTUNITIES: TRANSPORTATION PRODUCTS

<i>OPPORTUNITY</i>	<i>DESCRIPTION</i>
<i>Buy traffic cones/traffic barricades that meet the EPA RMAN</i>	<i>The EPA RMAN specifies that traffic cones made of plastic or crumb rubber is 50 to 100% recovered material. Traffic barricades, depending on type, should have a recovered material content of 25% (steel) to 100% (all others).</i>
<i>Purchase parking stops that meet the EPA RMAN</i>	<i>Parking stops made of concrete should contain either coal fly ash or ground granulated blast furnace slag (see EPA RMAN for details). Plastic or rubber stops should be 100% recovered materials (See GSA Environmental Products Guide).</i>
<i>Purchase compliant traffic control devices</i>	<i>Channelizers, delineators, and flexible delineators should meet EPA RMAN requirements.</i>

TABLE 3-5. PROPOSED AFFIRMATIVE PROCUREMENT OPPORTUNITIES: PARK AND RECREATION PRODUCTS

<i>OPPORTUNITY</i>	<i>DESCRIPTION</i>
<i>Purchase plastic fencing for specified uses</i>	<i>Plastic fencing used in controlling snow or sand drifting and as a warning/safety barrier in construction should contain 60-100% postconsumer material.</i>
<i>Purchase park benches and picnic tables made with recovered materials</i>	<i>Plastic park benches and picnic tables should contain 100% total recovered materials content. Aluminum benches and tables should contain 25% postconsumer material, steel benches and tables—25 to 100% total recovered materials content, and concrete benches and tables should contain 15-40%.</i>
<i>Use plastic or rubber playground or running tracks</i>	<i>Playground surfaces or running tracks (plastic or rubber) should contain 90-100% postconsumer material.</i>

TABLE 3-6. PROPOSED AFFIRMATIVE PROCUREMENT OPPORTUNITIES: LANDSCAPE PRODUCTS

<i>OPPORTUNITY</i>	<i>DESCRIPTION</i>
<i>Use hydraulic mulch</i>	<i>Use hydraulic mulch, which contains up to 100% postconsumer content of paper or wood/paper. Require contractors performing landscaping or grounds maintenance to do the same through contract modifications. Seeding associated with construction projects should be done using hydraulic mulch.</i>
<i>Use yard trimmings compost</i>	<i>Purchase or produce compost from yard trimmings, leaves, and/or grass clippings using an on-site composting system when feasible. If trees are to be trimmed on the Installation, have the contractor chip the branches and leave the material on-site for future use as a soil amendment.</i>
<i>Purchase plastic lumber landscaping timbers and posts</i>	<i>Plastic lumber and landscaping timbers are available containing 25-100% postconsumer material.</i>
<i>Purchase garden hoses made of recycled material</i>	<i>Garden and soaker hoses are available in rubber or plastic made from 60 to 70% postconsumer material.</i>
<i>Purchase lawn and garden edging made of recycled material</i>	<i>Rubber and plastic lawn and garden edging is available containing 30 to 100% postconsumer materials. Use these in place of conventional garden edging devices.</i>

TABLE 3-7. PROPOSED AFFIRMATIVE PROCUREMENT OPPORTUNITIES: NON-PAPER OFFICE PRODUCTS

OPPORTUNITY	DESCRIPTION
<i>Compile a list of JWOD-compliant sources</i>	<i>Identify the JWOD compliant office supply catalogs that Government purchasers should use. Catalogs should be shared with Government purchase cardholders and contracting must insist that Government purchase cardholders purchase those mandatory products over all other items unless unavailable. (Government purchase cardholders will need to justify this.)</i>
<i>Purchase recycling containers and waste receptacles with recycled content</i>	<i>Recycling containers and waste receptacles made of plastic, steel, and paper can be purchased with various amounts of postconsumer recovered material. Consult local vendors or the GSA Environmental Products Guide for more information.</i>
<i>Purchase plastic desktop accessories that contain recovered materials</i>	<i>Plastic desktop accessories including desk organizers; sorters and trays; and memo, note, and pencil holders are available containing recovered materials (20 to 80%). Consult local vendors or the GSA Environmental Products Guide for more information.</i>
<i>Purchase/use trash bags with recycled content</i>	<i>Use plastic trash bags that have 10 to 100% postconsumer recovered content. If the janitorial contract requires that plastic bags be supplied as part of the contract, then the contractor should be encouraged to use these types of bags or the contract should be changed.</i>
<i>Return toner cartridges for recycling</i>	<i>A system should be in place for used toner cartridges to be returned to the manufacturer for recycling. Every effort should be made to buy from those sources that will accept used cartridges.</i>
<i>Use remanufactured toner cartridges whenever feasible</i>	<i>Users of laser printers should procure remanufactured toner cartridges whenever possible through Installation Supply or from local vendors.</i>
<i>Use re-inked printer ribbons</i>	<i>Procure printer ribbon re-inking or reloading services or procure re-inked or reloaded printer ribbons. This would apply primarily to users of high-speed impact printers for computer printouts.</i>
<i>Purchase binders, clipboards, file folders, clip portfolios, and presentation folders with recycled content</i>	<i>These products are made with postconsumer material ranging from 20-100%. Consult the GSA Environmental Products Guide for more information.</i>
<i>Procure plastic envelopes</i>	<i>Plastic envelopes made from 25% (postconsumer) and 25 to 35% (total) recovered materials are available and should be used whenever possible. The GSA Environmental Products Guide provides a list of envelopes that meet this requirement.</i>

TABLE 3-8. PROPOSED AFFIRMATIVE PROCUREMENT OPPORTUNITIES: MISCELLANEOUS PRODUCTS

OPPORTUNITY	DESCRIPTION
<i>Purchase awards and plaques made with recovered materials</i>	<i>Recovered-content awards are generally made from blown glass (75-100% postconsumer material) while plaques can be made with a variety of recovered materials including wood, paper, plastic, and plastic/wood composites (40-100% total recovered materials content).</i>
<i>Use drums made with recovered materials</i>	<i>Steel, plastic, and pressed fiberboard drums can be manufactured with recovered steel (25-30%), HDPE (30-100%), and paperboard (100%).</i>
<i>Purchase mats made with recycled content.</i>	<i>Rubber or plastic mats may be purchased with total recovered materials content of 80-100%.</i>
<i>Use signage containing recovered materials.</i>	<i>Plastic (80-100% postconsumer material) or aluminum (25% postconsumer material) signage may be purchased with plastic or steel supports containing 25-100% total recovered materials.</i>
<i>Purchase recycled-content sorbents.</i>	<i>Sorbents can be manufactured using recovered paper, textiles, plastics, wood, and other materials containing 25-100% total recovered materials.</i>
<i>Use strapping made with recovered materials.</i>	<i>Strapping is available with recovered materials content from 10-100%. Consult the GSA Environmental Products Guide for more information.</i>
<i>Use plastic or recycled lumber for pallet construction.</i>	<i>Installations receive a number of wood pallets as a result of products shipped on them. Installations should investigate the use of plastic lumber or thermoformed lumber. In addition, installations should investigate the use of recycled wood pallets.</i>

TABLE 3-9. PROPOSED AFFIRMATIVE PROCUREMENT OPPORTUNITIES: ADMINISTRATIVE

OPPORTUNITY	DESCRIPTION
<i>Implement an Installation-wide outreach program</i>	<i>Each individual on the Installation, whether a purchaser of products or simply a user, should be aware of the AP concepts. Awareness through the use of brochures, signs, banners, and newspaper articles/ads will go a long way in promoting the APP at RSA.</i>
<i>Instruction of Government purchase card holders of the requirements of AP</i>	<i>Government purchase cardholders will be making more and more of the local purchases as time goes on. They will be the ones who will be making the decisions about what products they need to purchase and which ones could be purchased containing recycled content. Training should be done in conjunction with initial Government purchase card training. For those already issued Government purchase cards that do not have this training, special training should be established for them in addition to receiving the AP Reference Guide.</i>
<i>Installation-wide AP training</i>	<i>RSA could consider having all staff members attend a training session on AP procedures.</i>
<i>Establish a tracking system</i>	<i>The Installation should establish an AP tracking system for determining the Installation's level of compliance with the CPG.</i>
<i>Implement an AP incentive program</i>	<i>Reward those organizations that have the highest percentage of AP purchases. This will not only provide incentives to organizations to purchase products that meet the CPG, but also will encourage them to accurately report their purchases and outline which ones meet the requirements and which do not. "Rewards" can be as simple as recognition in the Installation newspaper, or a "trophy" made from recycled materials.</i>

4.0 AFFIRMATIVE PROCUREMENT REFERENCES

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APPENDIX A

COMPREHENSIVE PROCUREMENT GUIDELINE ITEMS

Construction Products:

- Building Insulation Products
- Carpet
- Carpet Cushion
- Cement and Concrete containing:
 - Coal Fly Ash
 - Ground Granulated Blast Furnace Slag
- Consolidated and Reprocessed Latex Paint
- Floor tiles
- Flowable Fill
- Laminated Paperboard
- Patio Blocks
- Railroad Grade Crossing Surfaces
- Shower and Restroom Dividers/Partitions
- Structural Fiberboard

Landscaping Products:

- Garden and Soaker Hoses
- Hydraulic Mulch
- Plastic Lumber Landscaping Timbers and Posts
- Lawn and Garden Edging
- Compost Made from Yard Trimmings or Food Waste

Non-paper Office Products:

- Binders, Clipboards, File Folders, Clip Portfolios, and Presentation Folders
- Office Recycling Containers
- Office Waste Receptacles
- Plastic Desktop Accessories
- Plastic Envelopes
- Plastic Trash Bags
- Printer Ribbons
- Toner Cartridges

Paper and Paper Products:

- Commercial/Industrial Sanitary Tissue Products
- Miscellaneous Papers
- Newsprint
- Paperboard and Packaging Products
- Printing and Writing Papers

Park and Recreation Products:

- Park Benches and Picnic Tables
- Plastic Fencing
- Playground Equipment
- Playground Surfaces
- Running Tracks

Transportation Products:

- Channelizers
- Delineators
- Flexible Delineators
- Parking Stops
- Traffic Barricades
- Traffic Cones

Vehicular Products:

- Engine Coolants
- Re-refined Lubricating Oils
- Retread Tires

Miscellaneous Products:

- Awards and Plaques
- Industrial Drums
- Mats
- Pallets
- Signage
- Sorbents
- Manual-grade Strapping